

HUMAN RIGHTS POLICY

UPDATED 2022

COMMITMENT

Disney is a diverse, multi-media entertainment company with operations around the world. We commit to utilizing the United Nations' *Guiding Principles on Business and Human Rights* as the foundation of our human rights commitments and recognize the human rights referenced in the *International Bill of Human Rights* as well as the principles referenced in the International Labor Organization's *Declaration on the Fundamental Principles and Rights at Work* and the *Convention on the Rights of the Child*.

Following these principles, we evaluate where we may cause or contribute to actual or potential adverse human rights impacts through our own business activities, or where human rights impacts may be directly linked to our operations, products, and services by our business relationships. We exercise due diligence on an on-going basis to identify, prevent, mitigate, and account for human rights risks and impacts, and we update our assessment of salient human rights risks as new information becomes available. We aim to prioritize action in areas where we may have a negative impact or can affect greater change. We seek to understand potential or actual risks to rights-holders through continuous dialogue with our employees, content creators, and guests; engagement with external stakeholders; collaboration with industry and multi-stakeholder groups; maintenance of in-house human rights experts; and ongoing research.

OUR FOCUS AREAS

Our People

At Disney, inclusion is for everyone. Our intention is for our workforce to reflect the world in which we operate. Our Company is comprised of employees from a variety of cultures, backgrounds and communities. We embrace our multicultural workforce and seek to offer a workplace that offers opportunities to all and are thus committed to diversity, equity and inclusion.

We respect labor rights consistent with all applicable laws, including those that promote a safe and healthy work environment, seek to eliminate child labor, forced labor and discrimination, and recognize freedom of association and collective bargaining rights.

As outlined in our [Standards of Business Conduct](#), we do not tolerate any form of harassment or discrimination on the basis of race, religion, color, sex, sexual orientation, gender identification, national, social or ethnic origin, age, marital status, military or veteran status, disability, pregnancy, union membership, political affiliation or any other basis prohibited by applicable law.

Our Standards of Business Conduct apply to all employees, including temporary, part-time and seasonal employees, and outline employee rights and responsibilities, including how to elevate workplace concerns. Our Human Resources function oversees our relationship with our employees and maintains a wide range of resources and tools to support and communicate with employees.

Our Content

Disney takes great pride in creating and distributing quality content through our films, television, streaming services, live theatrical productions, theme parks, resorts, cruise ships, consumer products, and other experiences. We create and share stories that reflect the rich diversity of cultural expression and human experience, and that promote values of respect, tolerance, inclusion, and kindness. We engage the talents and experiences of a wide range of artists, creators, and production members across the globe.

We respect the right to freedom of information and expression, the freedom of the press, the rights of indigenous people and intellectual property rights. Our content informs and entertains around the world and as storytellers we aim to uplift and inspire, and to embrace the spectrum of voices and perspectives in our world.

In countries where we operate, we seek to share our stories in their original form as we and the artists involved have created them. If we make edits because of legal or other considerations, they will be as narrow as possible. We will not make an edit where we believe it would impact the storytelling. In that circumstance, we will not distribute the content in that market.

Our Products and Supply Chains

Our consumer products bring Disney's stories, characters and franchises to life through toys, apparel, books and a wide variety of merchandise. These products are manufactured in approximately 100 countries through a diverse set of global relationships. In addition, we purchase a vast array of products, materials, and services from thousands of suppliers to support our operation of: theme parks and resorts; cruise and vacation experiences; film, television, streaming, and theatrical productions; and offices and distribution centers. Across these supply chains, we work with our business partners to foster safe, inclusive and respectful workplaces wherever these products and their components and raw materials are made. We have established a [Supply Chain Code of Conduct](#), which is aligned around the ILO's *Declaration on the Fundamental Principles and Rights at Work*.

Our consumer products licensees and vendors are contractually obligated to comply with the [protocols](#) in our [International Labor Standards Program](#), which may include on-site factory assessments and remediation. We employ [risk-based criteria](#) to take special measures in locations where labor rights risks are higher and provide dedicated support to internal and external business partners to encourage facility improvement. We investigate any allegations of non-compliant conditions, support remediation as needed, and communicate findings. We also publish our [factory list](#) on an annual basis in order to drive further collaboration in identifying and addressing any site-specific issues.

Across our business operations, we are committed to identifying the potential for, and preventing instances of, forced labor and human trafficking. In the recruitment of our employees, we hire directly or engage recruitment agencies committed to ethical recruitment. We follow the Employer Pays Principle in both our direct employment practices as well as our consumer products supply chain, which addresses recruitment fees, withholding of personal identity papers, and the provision of clear contract terms. We utilize emerging industry standards, tools, collaborative initiatives, and resources in hospitality, consumer products, and other sectors to reduce the potential for forced labor and human trafficking.

Our Communities

Our theme parks, resorts, studios, productions, offices, and other sites around the world represent significant, place-based operations collectively employing thousands of people and affecting the communities where they are located. We work closely with local stakeholders to understand and mitigate any local impacts on human rights as well as to contribute to the community where we operate or are producing content. We support and contribute to local community needs through outreach and philanthropic activities. Our approach to corporate social responsibility is built upon our long and enduring legacy of engagement and investment in our workplace and communities.

We are committed to protecting the planet and delivering a positive environmental legacy for future generations as we operate and grow our business. Across our businesses, we seek to minimize our environmental impacts and respect the rights of communities that may be affected by our products, productions and services. Our [environmental goals](#) address the impacts of greenhouse gas emissions, water, waste, materials, sustainable building design and other efforts.

Children

The well-being of children is of the utmost importance to The Walt Disney Company. We look to the *Convention on the Rights of the Child* and the Children's Rights and Business Principles as key resources in understanding children's rights. Our guidelines and policies are designed to take extra care to promote the physical and digital safety of children. Our theme parks and resorts, cruise ships, guided tours, and other physical-world experiences all employ extensive safety and security management systems, programs and practices. Online, we recognize the promise of technology for children's education, expression, and inclusion. We take a safety-by-design approach, maintaining a range of policies and practices to assess regularly and

mitigate any potential adverse impacts on children’s [privacy](#), safety, and development, including a focus on age-appropriate content, use of parental controls and responsible marketing guidelines.

We recognize that we are in a position to promote healthier food and lifestyle choices for children and their families. As such, we maintain best-in-class [Nutrition Guidelines](#) that describe the use of our brands and characters in advertising, promotions and sponsorships; product licensing; and the food and drink we serve in our theme parks and resorts. Our [Supply Chain Code of Conduct](#) prohibits child labor, and through our International Labor Standards program for Disney-branded consumer products, we prioritize on-site assessments and remediation in countries where there may be a higher potential risk of child labor.

Privacy

We are dedicated to protecting the personal information of our guests, customers and employees. We provide transparency about our data collection and use practices through our [online privacy policy](#) and other disclosures and give individuals appropriate controls over our use of their information.

GOVERNANCE

Our Human Rights Policy falls under the responsibilities of the [Governance and Nominating Committee](#) of the Board of Directors and is overseen by our General Counsel, and coordinated at an enterprise level. Cross-functional teams meet periodically to explore emerging issues, share progress, and identify areas for improvement. Routine updates are provided to senior management and the Board of Directors. Given the breadth and size of the Company and the diversity of human rights issues, a large number of departments are accountable for advancing our human rights commitments depending on the issue area.

GRIEVANCE MECHANISMS AND REMEDY

Several mechanisms exist to allow internal and external stakeholders to raise concerns. These include a [Workplace Alert Program](#), which serves as a confidential and anonymous method of reporting concerns regarding violation of law, Company policy, or other misconduct, or to seek guidance on any business conduct-related issue for employees, cast members, vendors, suppliers and customers. Stakeholders may also [contact](#) the Company directly with concerns. In addition, 24/7 helpline numbers are available in dozens of countries to report concerns or questions regarding the behavior of any Disney agent, or to report a violation of the ethics policy.

The Company has also supported a number of initiatives that promote ethical conduct in the manufacturing of Disney-branded products, including factory grievance mechanisms, worker helplines, and technology-enabled worker feedback solutions.

Where we cause or contribute to an adverse impact, we will take the necessary steps to cease, mitigate or prevent the impact. Where the impact is linked to our operations, products, or services, we will use our leverage to mitigate any remaining impact to the greatest extent possible. The particular form that this

leverage may take and the remedies made available to impacted rights-holders, vary depending upon the issues and circumstances.

REPORTING AND ENGAGEMENT

We regularly report on our salient risks and progress on [impact.disney.com](https://www.impact.disney.com), through our CSR report, and through other voluntary and regulatory disclosures.

We believe that collaboration with others is critical. [Our Supply Chain Investment Program](#) provides funding and support to United Nations agencies, human rights groups, and social enterprises to advance solutions and scale innovative programs, which address root causes of labor and human rights issues and enhance supply chain transparency. Through our Digital Wellness Grant Portfolio, Disney supports NGOs working on digital issues that affect the health, safety, and success of children around the globe.

We actively participate in a wide number of [collaborative initiatives](#), human rights-related forums, and one-on-one engagements with external stakeholder groups to continually advance our knowledge and to contribute to collective problem-solving.

At Disney, we know our work is a continuous journey and we remain committed to advancing our progress.